

1 JACQUELINE TIRINNANZI, ESQ.  
2 Nevada Bar 13266  
3 jt@kathleenblisslaw.com  
4 KATHLEEN BLISS LAW PLLC  
5 1070 W. Horizon Ridge Pkwy., Suite 202  
6 Henderson, Nevada 89012  
7 Telephone: (702) 463-9074

8  
9 *Attorney for Alejandra Enriquez-Atunez*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 ALEJANDRA ENRIQUEZ-ATUNEZ,

14 Defendant.

15 CASE NO. 2:21-CR-00169-CDS-BNW

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**UNOPPOSED MOTION FOR TRAVEL  
OUTSIDE THE DISTRICT OF NEVADA**

17 COMES NOW, Defendant, Alejandra Enriquez-Atunez, and hereby respectfully requests  
18 this Honorable Court issue an Order granting Defendant leave to travel outside the state of Nevada  
19 to Los Angeles, CA, on September 23, 2022 through September 25, 2022. Ms. Enriquez-Atunez  
20 will be traveling with her three daughters.

21 To date, Ms. Enriquez-Atunez has been compliant with all terms of her supervised release.  
22 Ms. Enriquez-Atunez has booked one night at the Hollywood Motel 6 (address has been provided  
23 to Pre-trial Services) where they will stay during the trip. Ms. Enriquez-Atunez is requesting  
24 permission to travel out of the jurisdiction with her three daughters for the two-day trip and will  
25 return to Las Vegas late the evening of September 24, 2022 (or the early hours of September 25,  
26 2022 depending on the traffic conditions). All travel will be via vehicle.

KATHLEEN BLISS LAW PLLC  
1070 W. HORIZON RIDGE PKWY., SUITE 202  
HENDERSON NEVADA 89012  
TEL - 702.463.9074

The Defense has spoken to both Pre-Trial Services Officer Mariah Bassler-Wide and AUSA Kimberly Sokolich regarding the request. AUSA Sokolich advised she would defer to Pre-Trial Services and Officer Bassler-Wide has no objection to this request, so long as the documentation for the address where they will be staying overnight was provided (documentation of the hotel booking was provided to Officer Bassler-Wide). For these reasons, Ms. Enriquez-Atunz respectfully requests the Court grant her Unopposed Motion for Travel from the period of September 23, 2022 through September 25, 2022.

Dated this 21<sup>st</sup> day of September, 2022.

Respectfully submitted,

/s/ Jacqueline Tirinnanzi  
JACQUELINE TIRINNANZI, ESQ  
Nevada Bar No. 13206  
1070 W. Horizon Ridge Pkwy, Suite 202  
Henderson, NV 89012  
Telephone: 702.463.9074  
Attorney for Defendant  
Alejandra Enriquez-Atunez

## **ORDER**

# IT IS SO ORDERED

**DATED:** 2:15 pm, September 22, 2022

**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

I certify that I am an Attorney of Counsel at KATHLEEN BLISS LAW PLLC and that on this 21st day of September 2022, I did cause a true copy of:

**UNOPPOSED MOTION FOR TRAVEL OUTSIDE THE DISTRICT OF NEVADA**

To be served via electronic service by the U.S. District Court CM/ECF system to the parties on the Electronic Filing system in this action.

By: /s/ Jacqueline Tirinnanzi  
An Attorney of Counsel at  
KATHLEEN BLISS LAW

**KATHLEEN BLISS LAW PLLC**  
1070 W. HORIZON RIDGE PKWY., SUITE 202  
HENDERSON NEVADA 89012  
TEL - 702.463.9074